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PARALEGAL
Maria Nunez, B.S.

November 1, 2023

Via ECF

Honorable Laura Taylor Swain
Chief United States District Judge
United State District Court
Southern District of New York
500 Pearl Street
New York, NY 10007

MEMO ENDORSED

Re: United States of America v. Ivan Collado
Case No.: 14-CR-731 (LTS)

Your Honor:

This office represents Ivan Collado, the Defendant in the above referenced matter. On October 18th we wrote the Court respectfully requesting permission for Ivan to travel to the Dominican Republic on vacation from November 3, 2023 through November 18, 2023. Mr. Collado's U.S. Probation Officer Sabrina Gargano (347) 534-3701 has been advised and consents to this request. We did not, pursuant to the Court's Individual Practices, Rule A.1.b, indicate what efforts to consult with the Government were made. The Court, on October 19th denied, without prejudice, this request in order to indicate the Government's position.

We telephoned to former AUSA Jennifer Burns and found out that she is now in private practice and has left the U.S. Attorney's Office. We also telephoned former AUSA Andrew Caldwell Adams (also on the docket sheet) and were advised that he too has left the U.S. Attorney's Office and now resides in Australia. We have repeatedly asked for a positoin on this request from the U.S. Attorney's Office and have yet to receive one. Mr. Collado's travel plans call for his departure in 2 days on November 3rd. We respectfully suggest that our efforts at obtaining the U.S. Attorney's position on this request indicate that we have complied with the Court's Individual Practices. The Court's permission for Mr. Collado's travel is again, respectfully and urgently requested.

Mr. Collado has been cooperative and compliant with his post release conditions; and has maintained consistent gainful employment since his release in 2022 – currently holding down **two** jobs [building maintenance and doorman] at a Queens Condominium development. His employment is steady, full time, includes benefits and pays well. Given Mr. Collado's history he is beyond grateful to have found such good work.

The Court's consideration of this request is respectfully requested and appreciated.

Yours truly,

John Russo

John L. Russo(JR6200)

JLR:mn

The foregoing request is granted, and Mr. Collado is permitted to travel to the Dominican Republic from November 3 to November 18, 2023. DE#205 resolved.

SO ORDERED.

November 1, 2023

/s/ Laura Taylor Swain, Chief USDJ